

# **EXHIBIT “B”**

**TABLE A:**  
**PLAINTIFFS NOT AMENDING/SUPPLEMENTING FACT SHEETS**  
**FOLLOWING DEFICIENCY NOTICE (*FIRST LISTING*)**

	Plaintiff	Civil Action No.	Law Firm	Deficiencies
1.	Rodich-Annese, Valerie	1:19-cv-07161	Migliaccio & Rathod	<i>See Deficiency Notice</i>
2.	Wineinger, Brian	1:19-cv-01070	Bursor & Fisher PA	<i>See Deficiency Notice</i>

**TABLE B:**  
**PLAINTIFFS WHO HAVE AMENDED/SUPPLEMENTED**  
**PLAINTIFF'S FACT SHEETS**  
**WITH WHOM DISPUTES REMAIN (*FIRST LISTING*)**

	Plaintiff	Civil Action No.	Law Firm	Remaining Core Deficiencies
1.	Holland, Jerry	1:19-cv-07154	Farr, Farr, Emerich, Hackett, Carr & Holmes P.A.	<p>I.C- Failed to attach medical records</p> <p>I.C.2 - Failed to attach records. - Failure to provide prescription and/or pharmacy records.</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.B.1 - Failed to provide records requested.</p> <p>XI.B.2 - Failed to provide records requested.</p> <p>XI.B.4 - Failed to provide records requested.</p> <p>XI.B.10 - Failed to provide records requested.</p>
2.	Witte, Laurence	1:19-cv-16971	Matías J. Adrogué, PLLC	<p>I.C.4 - Failed to respond.</p> <p>I.C.5 - Failed to respond.</p> <p>I.C.6 - Failed to respond.</p>

				<p>I.C.7 - Failed to respond.</p> <p>I.C.8 - Failed to respond.</p> <p>IV.C.2 - Failed to provide address and phone number for CVS Pharmacy. Please clarify</p> <p>IV.C.3 - Failed to provide approximate dates for CVS Pharmacy. Please clarify</p> <p>V.G.2 - Failed to identify name, address, and phone number of treating health care provider for pulmonary embolism/blood clot in lung. Please clarify</p> <p>V.G.3 - Failed to identify any approximate dates of onset. Please clarify</p> <p>VII.A.4.b - Failed to identify primary oncologist or physician and dates of treatment for basal cell carcinoma. Failed to identify primary oncologist or physician and dates of treatment for skin cancer. Please clarify</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.A.6 - Failed to provide properly signed, dated, and completed authorization.</p>
3.	Needy, Lenny	1:19-cv-15051	Golden Law Office	<p>I.C.5 - Failed to respond.</p> <p>I.C.9 - Failed to respond.</p> <p>I.C.10 - Failed to respond.</p> <p>II.D.2.d - Failed to provide complete information. Objections to Collateral Source Rule are not permissible.</p> <p>II.D.2.e - Failed to provide complete information. Objections to Collateral Source Rule are not permissible.</p> <p>V.E.3 - Failed to provide complete information re Alcohol Use history.</p>

				<p>V.G.3 - Failed to provide complete information.</p> <p>XI.A.1 - Failed to provide properly signed, undated, and completed authorization. Failed to complete provider information and undated authorization.</p> <p>XI.A.4 - Failed to provide properly signed, undated, and completed authorization. - Failed to complete provider information and undated authorization.</p> <p>XI.A.5 - Failed to provide properly signed, undated, and completed authorization. - Relevance objections are inadequate and improper response to court-approved fact sheet</p> <p>XI.A.6 - Failed to provide properly signed, undated, and completed authorization. - Objections are an inadequate and improper response to court-approved fact sheet</p> <p>XI.A.7 - Failed to provide properly signed, dated, and completed authorization. - Failed to complete provider information and undated authorization.</p>
4.	Stano, David	1:19-cv-18080	Gennusa Piacun & Ruli	<p>I.C.2 - Failed to attach records.</p> <p>I.C.10 - Failed to respond.</p> <p>I.C.11 - Failed to respond.</p> <p>I.C.13 - Failed to provide complete information. - Failed to provide address for Dr. Glade. Please clarify</p> <p>I.C.14 - Failed to provide complete information. - Failed to provide address for Humana Pharmacy. Please clarify</p> <p>I.D.1 - Failed to attach records.</p> <p>I.D.2 - Failed to respond.</p>

				<p>I.D.3 - Failed to respond.</p> <p>I.D.4 - Failed to respond.</p> <p>I.D.5 - Failed to respond.</p> <p>I.D.6 - Failed to respond.</p> <p>I.D.7 - Failed to respond.</p> <p>I.D.8 - Failed to respond.</p> <p>III.A.1.b - Failed to respond.</p> <p>III.C.1 - Failed to respond.</p> <p>III.C.2.a - Failed to respond.</p> <p>III.C.3 - Failed to respond.</p> <p>III.C.3 - Failed to respond.</p> <p>III.C.3.a.i - Failed to respond.</p> <p>III.C.3.a.ii - Failed to respond.</p> <p>III.C.3.b - Failed to respond.</p> <p>III.C.3.c.i - Failed to respond.</p> <p>III.D.3 - Failed to respond.</p> <p>III.G.a - Failed to respond.</p> <p>III.G.b - Failed to respond.</p> <p>III.G.c - Failed to respond.</p> <p>III.H. - Failed to respond.</p> <p>IV.C.2 - Failed to provide address and telephone number for Humana Pharmacy and failed to provide telephone number for All Saints Pharmacy. Please clarify</p> <p>IV.C.3 - Failed to provide approximate begin dates for Humana Pharmacy and All Saints Pharmacy. Please clarify</p>
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				<p>V.A. - Failed to respond.</p> <p>V.B. - Failed to respond.</p> <p>V.C. - Failed to respond.</p> <p>V.D1.a - Failed to respond.</p> <p>V.D1.b - Failed to respond.</p> <p>V.D1.d - Failed to provide complete information. - Amount used is ambiguous. Please clarify</p> <p>V.D1.d.i - Failed to provide complete information. - On average is ambiguous. Please clarify</p> <p>V.D1.d.(iii) - Failed to respond.</p> <p>V.E.1 - Failed to respond.</p> <p>V.F.27 - Failed to respond.</p> <p>V.F.45 - Failed to respond.</p> <p>V.F.46 - Failed to respond.</p> <p>V.F.47 - Failed to respond.</p> <p>V.F.49 - Failed to respond.</p> <p>V.F.50 - Failed to respond.</p> <p>V.F.51 - Failed to respond.</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization. - Failed to provide requisite number of health care authorizations. Please supplement</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization. - Failed to provide requisite number of health care authorizations. Please supplement</p> <p>XI.A.6 - Failed to provide properly signed, dated, and completed authorization.</p>
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				<p>XI.A.7 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.B.10 - Failed to provide records requested.</p> <p>XI.B.18 - Failed to provide records requested. - Also inconsistent with Section III.G where no medical expenses were listed. Please clarify</p>
5.	Shepherd, Kelly	1:19-cv-12038	Levin Papantonio Thomas Mitchell Rafferty & Proctor, P.A.	<p>III.G.a - Failed to provide complete information. - Failed to specify providers for medical expenses.</p> <p>III.G.b - Failed to respond.</p> <p>III.G.c - Failed to respond.</p>
6.	Kleinman, Priscilla	1:19-cv-07152	Watts Guerra, LLP	<p>XI.B.2 - Failed to provide records requested. - Failed to provide responsive documents</p> <p>XI.B.12 - Failed to provide records requested. - Failed to provide responsive documents</p> <p>XI.B.13 - Failed to provide records requested. - Failed to provide responsive documents</p> <p>XI.B.14 - Failed to provide records requested. - Failed to provide responsive documents</p>
7.	Bell, Ricky	1:19-cv-19135	Ron Austin Law	<p><b><u>NUMEROUS CORE AND MINOR DEFICIENCIES FOR SUBSTANTIALLY INCOMPLETE:</u></b></p> <p>I.A.1 - Failed to respond.</p> <p>I.A.2 - Failed to provide complete information. - Failure to provide the docket number</p> <p>I.B.8 - Failed to respond.</p> <p>I.C.2 - Failed to attach records.</p> <p>I.C.5 - Failed to respond.</p>

				<p>I.C.6 - Failed to respond.</p> <p>I.C.7 - Failed to respond.</p> <p>I.C.8 - Failed to respond.</p> <p>I.C.9 - Failed to respond.</p> <p>I.C.11 - Failed to respond.</p> <p>I.C.12 - Failed to provide complete information. - Failure to provide reason for prescription for columns 3 and 4.</p> <p>I.C.14 - Failed to provide complete information. - This is inconsistent with the information in the SFC. Please clarify the discrepancy.</p> <p>I.D.1 - Failed to attach records.</p> <p>I.D.2 - Failed to respond.</p> <p>I.D.3 - Failed to respond.</p> <p>I.D.4 - Failed to respond.</p> <p>I.D.5 - Failed to respond.</p> <p>I.D.6 - Failed to respond.</p> <p>I.D.7 - Failed to respond.</p> <p>I.D.8 - Failed to respond.</p> <p>II.A.1 - Failed to respond.</p> <p>II.A.2 - Failed to provide complete information. - Failure to provide date to current address</p> <p>II.A.2.c - Failed to provide complete information. - date began living at address is missing.</p> <p>II.A.3 - Failed to respond.</p>
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				<p>II.D.2.d - Failed to provide complete information. - Dates of Employment - Did not list all employers in the past ten years.</p> <p>II.D.2.e - Failed to respond.</p> <p>II.D.3.a - Failed to provide complete information. - Failure to provide date</p> <p>II.D.4.a - Failed to respond.</p> <p>II.D.4.b - Failed to respond.</p> <p>II.D.4.c - Failed to respond.</p> <p>II.D.4.d - Failed to respond.</p> <p>II.D.4.e - Failed to respond.</p> <p>II.D.4.f - Failed to respond.</p> <p>II.D.4.g - Failed to respond.</p> <p>II.D.4.h - Failed to respond.</p> <p>II.D.4.i - Failed to respond.</p> <p>II.D.4.j - Failed to respond.</p> <p>II.E.2 - Failed to respond.</p> <p>II.J.1.a - Failed to provide complete information. - Please provide dates viewed.</p> <p>III.C.2.a.i - Failed to respond.</p> <p>III.C.2.a.ii - Failed to respond.</p> <p>III.C.3.a.i - Failed to provide complete information. - Failure to provide information for response 2</p> <p>III.C.3.a.ii - Failed to respond.</p> <p>III.C.5 - Failed to provide complete information. - Please specify medication.</p> <p>III.D.2 - Failed to respond.</p>
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				<p>III.G.b - Failed to respond.</p> <p>III.H. - Failed to respond.</p> <p>IV.A.3 - Failed to provide complete information. - Failure to provide start date</p> <p>IV.A.3 - Failed to provide complete information. - Failure to provide start date</p> <p>IV.A.3 - Failed to provide complete information. - Failure to provide start date</p> <p>IV.A.3 - Failed to provide complete information. - Failure to provide start date</p> <p>IV.A.3 - Failed to provide complete information. - Failure to provide start date</p> <p>IV.A.3 - Failed to provide complete information. - Failure to provide start date</p> <p>IV.A.4 - Failed to provide complete information. - Failure to provide reason for consultation for responses 3 and 4.</p> <p>IV.C.2 - Failed to provide complete information. - Failure to provide telephone number of pharmacy.</p> <p>IV.C.3 - Failed to provide complete information. - Failure to provide start date.</p> <p>V.A. - Failed to respond.</p> <p>V.G.4 - Failed to provide complete information. - Please specify medication and outcome.</p> <p>VI.A.3 - Failed to respond.</p> <p>VI.A.3 - Failed to respond.</p> <p>VI.A.3 - Failed to respond.</p> <p>VI.A.5 - Failed to respond. - Failure to provide reason for prescription for response 2.</p> <p>VI.B.2 - Failed to respond.</p>
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				<p>VI.B.3 - Failed to respond.</p> <p>VI.B.6 - Failed to respond.</p> <p>VIII.A. - Failed to provide complete information. VIII.A.1 - Failed to respond.</p> <p>VIII.A.3 - Failed to respond.</p> <p>VIII.A.4 - Failed to respond.</p> <p>VIII.A.5 - Failed to respond.</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.A.3 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.A.6 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.B.1 - Failed to provide records requested.</p> <p>XI.B.2 - Failed to provide records requested.</p> <p>XI.B.9 - Failed to provide records requested.</p> <p>XI.B.10 - Failed to provide records requested.</p> <p>XI.B.18 - Failed to provide records requested.</p>
8.	Bell, Sandy	1:19-cv-19171	Ron Austin Law	<p><b><u>NUMEROUS CORE AND MINOR DEFICIENCIES FOR SUBSTANTIALLY INCOMPLETE:</u></b></p> <p>I.A.1 - Failed to respond.</p> <p>I.A.2 - Information provided does not match SFC. Please clarify the discrepancy. - Docket number does not match the original docket number listed within the SFC. Please clarify</p> <p>I.C.2 - Failed to attach records.</p> <p>I.C.7 - Information provided does not match SFC. Please clarify the discrepancy. - SFC</p>

				<p>identifies every API Manufacturer possible, but the PFS only lists ZHP. Please clarify</p> <p>I.C.8 - Information provided does not match SFC. Please clarify the discrepancy. - SFC identifies every Labeler/Distributor possible, but the PFS only lists Solco. Please clarify</p> <p>I.C.11 - Failed to provide complete information. - Failed to provide end dates for the second, third, and fourth Valsartan/HCTZ listings. Please clarify</p> <p>I.C.12 - Failed to provide complete information. - Failed to provide reason for prescription for either the third or fourth Valsartan/HCTZ listing. Please clarify</p> <p>I.C.14 - Failed to provide complete information. - Does not match information provided in SFC. Please clarify.</p> <p>I.D.1 - Failed to attach records.</p> <p>I.D.2 - Failed to respond.</p> <p>I.D.3 - Failed to respond. - Listed "Other."</p> <p>I.D.5 - Failed to respond.</p> <p>I.D.6 - Failed to respond.</p> <p>I.D.7 - Failed to respond.</p> <p>I.D.8 - Failed to respond.</p> <p>II.A.2.c - Failed to provide complete information. - Failed to list the date you began living at the address. Please clarify</p> <p>II.A.3 - Failed to respond.</p> <p>II.C.3 - Failed to provide complete information. - Failed to provide even a year for beginning date of attending Plaisance High School. Please clarify</p>
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				<p>II.D.2.a - Failed to provide complete information. - Failed to provide information regarding current employment at Lowe's. Please clarify</p> <p>II.D.2.b - Failed to provide complete information. - Failed to provide information regarding current employment at Lowe's. Please clarify</p> <p>II.D.2.c - Failed to provide complete information. - Failed to provide information regarding current employment at Lowe's. Please clarify</p> <p>II.D.2.d - Failed to provide complete information. - Failed to provide information regarding current employment at Lowe's. Please clarify</p> <p>II.D.2.e - Failed to provide complete information. - Failed to provide information regarding current employment at Lowe's. Please clarify</p> <p>II.D.4.a - Failed to respond.</p> <p>II.D.4.b - Failed to respond.</p> <p>II.D.4.c - Failed to respond. - Failed to indicate dates of exposure. Please clarify</p> <p>II.D.4.d - Failed to respond. - Failed to indicate dates of exposure. Please clarify</p> <p>II.D.4.e - Failed to respond.</p> <p>II.D.4.f - Failed to respond.</p> <p>II.D.4.g - Failed to respond.</p> <p>II.D.4.h - Failed to respond.</p> <p>II.D.4.i - Failed to respond.</p> <p>II.D.4.j - Failed to respond.</p>
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				<p>II.E.2 - Failed to respond.</p> <p>II.J.1 - Failed to respond - Ambiguous response. Merely listed "Google.com" and did not list any dates when viewed. Please specify</p> <p>III.A.1.a - Failed to provide complete information. - Ambiguous. Please provide a more accurate date as to when you were diagnosed with hypertension. The listed response is too broad.</p> <p>III.C.2 - Failed to provide complete information. - Only provided year as to when the physical injury first occurred. Please clarify</p> <p>III.C.2.a - Failed to respond.</p> <p>III.C.2.a.i - Failed to respond.</p> <p>III.C.2.a.ii - Failed to respond.</p> <p>III.C.2.a.iii - Failed to provide complete information. - Failed to provide hospital name. Please clarify</p> <p>III.C.3.a.i - Failed to respond.</p> <p>III.C.3.a.ii - Failed to provide complete information. - Responded "Yes," but did not describe the type of treatment received. Please clarify</p> <p>III.C.3.b.ii - Failed to respond.</p> <p>III.C.3.b.iii - Failed to provide complete information. - Only listed the year for the procedure. Please clarify</p> <p>III.C.3.b.iii - Failed to provide complete information. - Only listed the year for the procedure. Please clarify</p> <p>III.C.5 - Failed to respond.</p> <p>III.D. - Failed to respond.</p>
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				<p>III.E. - Failed to respond.</p> <p>III.G.a - Failed to respond.</p> <p>III.G.b - Failed to respond.</p> <p>III.G.c - Failed to respond.</p> <p>III.G.1.c - Failed to provide complete information. - Only provided year for date of discussion. Please clarify</p> <p>III.G.2 - Failed to provide complete information. - Only indicated that "Dr. changed medication." This is ambiguous, as it does not specify the content of the conversation. Please clarify</p> <p>III.H. - Failed to respond.</p> <p>IV.A.3 - Failed to provide complete information. - Failed to provide an approximate start date for any of the three healthcare providers listed. Please clarify</p> <p>IV.A.4 - Failed to respond.</p> <p>IV.B.3 - Failed to provide complete information. - Failed to provide an approximate start date for the hospital listed. Please clarify</p> <p>IV.C.3 - Failed to provide complete information. - Failed to provide approximate start dates for either of the two pharmacies listed. Please clarify</p> <p>IV.D.3 - Failed to provide complete information. - Only provided the start year of the insurance carrier coverage. Please clarify</p> <p>V.A. - Failed to provide complete information. - Has not identified a cancer diagnosis. Please clarify the time of these measurements.</p> <p>V.G.1 - Failed to provide complete information. - Failed to include "stomach</p>
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				<p>ulcers/peptic ulcers" as a condition in this section despite listing it as a condition she was diagnosed with in the past ten years in the previous section.</p> <p>V.G.4 - Failed to provide complete information. - Ambiguous response for all three listed conditions. Please identify the treatment for colon polyps and stomach polyps, and identify the outcome for hypertension. Please also specify the medication for hypertension.</p> <p>VI.A.3 - Failed to provide complete information. - Only listed years for each of the two medications. Please clarify</p> <p>VI.A.4 - Failed to provide complete information. - Failed to provide frequency of use for either of the two listed medications. Please clarify</p> <p>VI.B.2 - Failed to respond.</p> <p>VI.B.3 - Failed to provide complete information. - Failed to provide a start date for any of the listed OTC products.</p> <p>VI.B.4 - Failed to provide complete information. - Failed to respond to the first two OTC products listed, and only provided the dosage for the third and fourth OTC products listed. Please clarify</p> <p>VI.B.5 - Failed to respond.</p> <p>VI.B.6 - Failed to respond.</p> <p>VIII.A.1 - Failed to respond. - Listed family members' relationships, not their names. Please correct</p> <p>VIII.A.2 - Failed to respond. - Listed both family members' relationships in the "Family Member" category. Please correct</p> <p>VIII.A.4 - Failed to respond.</p>
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				<p>VIII.A.5 - Failed to respond.</p> <p>VIII.A.5 - Failed to respond.</p> <p>VIII.A.6 - Failed to provide complete information. - Failed to provide details regarding treatment for either family member. Please clarify</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.A.6 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.B.1 - Failed to provide records requested.</p> <p>XI.B.2 - Failed to provide records requested.</p> <p>XI.B.6 - Failed to provide records requested.</p> <p>XI.B.9 - Failed to provide records requested.</p> <p>XI.B.10 - Failed to provide records requested.</p> <p>XI.B.19 - Failed to provide records requested.</p>
9.	Colins	20-01290	WATTS GUERRA, LLP	I.C. Failed to attach pharmacy records.
10.	De Los Santos	19-00406	Farr, Farr, Emerich, Hackett, Carr & Holmes P.A.	<p>I.C.2. Failed to attach records demonstrating product ID</p> <p>I.D.I. Failed to attach records demonstrating alleged injury (colon cancer)</p> <p>III.G.a. thru c. Failed to respond (Medical Expenses chart). Responded: "N/A" to Provider and Expense columns. Date column left blank.</p> <p>V.F.25. Failed to provide complete information. Checked "yes" (re: hypotension), but provided no further information.</p>

				<p>V.G.4. Failed to provide complete information. Did not provide outcome for each condition.</p> <p>XI.A.1. Failed to provide health care authorization</p> <p>XI.A.6. Failed to provide tax authorization</p> <p>XI.B.1. Checked box indicating documents attached, but there are no documents in MDL Centrality.</p> <p>XI.B.2. Checked box indicating documents attached, but there are no documents in MDL Centrality.</p> <p>XI.B.4. Checked box indicating documents attached, but there are no documents in MDL Centrality.</p> <p>XI.B.10. Checked box indicating documents attached, but there are no documents in MDL Centrality.</p> <p>XII. Declaration not signed.</p>
11.	Hutchison	20-01503	Cellino & Barnes, PC	<p>I.C. Plaintiff indicates start date of valsartan was in June 2018, but in section IV she indicates valsartan began in 2010. Please clarify.</p> <p>I.D. Failed to provide date of cancer diagnosis and omitted whether a remission date is applicable.</p> <p>II.D.4 Omitted dates of exposure for red/processed meats and smoked fish.</p> <p>III.C.3. Omitted procedures and treatments.</p> <p>IV.A. Failed to provide all dates of treatment with each physician.</p> <p>V.G. Omitted physician information regarding, and failed to provide dates of onset for all conditions.</p>

				<p>VII. Omitted primary oncologist information and treatment facility information.</p> <p>VIII. Omitted dates of diagnoses.</p> <p>XIII. Failed to produce labeling/proof of use.</p>
12.	Wiseman			<p>II.D.4. Failed to respond to request for exposure information.</p> <p>III.C.1. thru 2. Failed to respond and inconsistent with initial Plaintiff Fact Sheet. Responded "To be provided" on initial Plaintiff Fact Sheet. On Amended Plaintiff Fact Sheet, these are now blank. Fails to indicate whether non-cancerous physical injuries are claimed.</p> <p>III.C.3.c. Failed to provide phone numbers for all listed physicians.</p> <p>III.G.1. Failed to respond to request for information regarding medical expenses, and this is inconsistent with the initial Plaintiff Fact Sheet. Responded: "To be provided," on initial Plaintiff Fact Sheet. On Amended Plaintiff Fact Sheet, this is now blank.</p> <p>III.H. Omitted other unique or specialized damages. Failed to respond.</p> <p>IV.A. Omitted specialties and phone numbers of all providers.</p> <p>VI.B. Failed to respond and inconsistent with initial Plaintiff Fact Sheet. Responded "To be provided" on initial Plaintiff Fact Sheet. On Amended Plaintiff Fact Sheet, this is now blank.</p> <p>V.G. Failed to provide phone number for providers and dates of onset for all conditions.</p>

13.	Zuckerman	20-01883	GARY F. FRANKE CO., L.P.A.	<p>III.G. Did not provide itemized medical expenses by provider as indicated would be produced.</p> <p>XII. Failed to sign Declaration.</p>
14.	Cardenas, Victor	1:20-cv-02251	Levin Papantonio	<p>III.G.a Failed to provide complete list of expenses.</p> <p>V.G.3 Inconsistent answer. Section IV.A states hypertension treatment since 2010. Please clarify. Please specify oral medication used to treat hypertension.</p> <p>XI.A.1 Failed to provide properly signed, undated, and completed authorization. Only one authorization, without provider information submitted.</p> <p>XI.A.3 Failed to provide properly signed, undated, and completed authorization. Only one authorization, without employer information submitted.</p> <p>XI.A.6 Failed to provide properly signed, undated, and completed authorization. Only one authorization, without insurer information submitted.</p> <p>XII Failed to provide dated declaration.</p>
15.	Carter, Jessie	1:19-cv-22118	Levin Papantonio	<p>I.C Information is inconsistent with Short Form Complaint.</p> <p>III.G.1 Failure to provide expense information.</p> <p>V.G.3 Failure to provide approximate date of onset for each condition listed.</p> <p>XI.A.1, 6 Failure to provide completed authorizations in the form approved by the Court.</p>

				XII Failure to attach a signed declaration attesting to answers in deficiency response.
16.	Crowther, John	1:20-cv-01050	Levin Papantonio	<p>III.G Failed to respond. Failed to list medical expenses.</p> <p>XI.A.1 Provided authorization in form not approved by the Court. Only one authorization submitted, with no provider information. Authorization is also dated.</p> <p>XI.A.6 Only one authorization submitted, with no insurance carrier information. Authorization is also dated.</p>
17.	Duncan, Jeffrey	1:19-cv-22125	Levin Papantonio	<p>I.C Information is inconsistent with Short Form Complaint.</p> <p>III.G.1-3 Failure to provide complete expense information.</p> <p>V.G.1-3 Failure to provide name, address, and phone number for provider relating to gallbladder disease.</p> <p>XI.A.1, 6, and 7 Failure to provide completed authorizations in the form approved by the Court.</p> <p>XII Failure to provide signed and dated declaration.</p>
18.	Hayden, Samuel	1:19-cv-20850	Levin Papantonio	<p>I. C. 8 Name of Labeler/Distributor conflicts with information in SFC.</p> <p>III. G. Failure to provide a list of medical expenses, provider and date.</p> <p>XI. A. 1-7 Failure to attach completed Authorizations.</p>

19.	Holoway, Jeanetta	1:19-cv-01235	Watts Guerra	<p>I.D Failed to respond and/or provide complete information. Plaintiff fails to give remission date, but her response is internally inconsistent with her answers to III.D (asking her whether any valsartan-related illness persists today) and V.B (asking her remission weight). Please clarify.</p> <p>III.D Failed to provide complete information. Plaintiff fails to give remission date at I.D, but her response is internally inconsistent with her answers to III.D (asking her whether any valsartan-related illness persists today) and V.B (asking her remission weight).</p> <p>To the extent Plaintiff still experiences symptoms related to her alleged valsartan-related illness, she must provide the requested information.</p> <p>V.B Failed to provide complete information. Plaintiff fails to give remission date at I.D, but her response is internally inconsistent with her answers to III.D (asking her whether any valsartan-related illness persists today) and V.B (asking her remission weight).</p>
20.	Johnson, James	1:19-cv-16586	Farris, Riley & Pitt	III.G.A Failed to provide medical expenses.
21.	Kaplan, Dennis	1:19-cv-16067	Golomb & Honik, P.C.	VI.A.1-2 Failed to provide properly signed, undated, and completed authorization.
22.	Kruk, Robert	1:19-cv-06211	Morgan Law Firm	<p>I.C Failure to attach pharmacy and medical records; failure to provide complete address of prescribing doctor.</p> <p>IV Failure to provide prescribed use of valsartan (i.e., “daily,” “as needed,” etc.).</p> <p>VI.A Failure to attached completed authorizations in the form approved by the Court.</p>

				<p>VI.B.1 Failure to attach responsive documents.</p> <p>VI.B.2 Failure to attaching medical records relating to product use.</p> <p>VI.B.4 Failure to attach documents relating to product use instructions.</p> <p>VI.B.6 Failure to attach documents relating to packaging/label.</p> <p>VI.B.7 Failure to attach documents relating to product purchase.</p> <p>VI.B.8 Failure to attach responsive documents.</p> <p>VI.B.10 Failure to attach documents relating to communications between Plaintiff and Defendants relating to the product recall.</p> <p>VII Failure to provide a signed and dated declaration.</p>
23.	Martey, Emmanuel	1:19-cv-06836	Levin Papantonio	<p>III.G Failure to provide a list of medical expenses, provider, and date.</p> <p>XI.A.7.1-7 Failure to attach completed Health Care Authorization; Tax Return Forms Authorizations; Employment Authorizations; Workers' Compensation Authorization; Disability Records Authorization; Insurance Records Authorization; and Mental Health Authorization.</p>
24.	Meals, Deborah	1:19-cv-20852	Levin Papantonio	<p>III.G.a Failed to provide list of medical expenses.</p> <p>V.G Failed to provide treatment received and outcome for hypertension.</p> <p>XI.A.1, 6 Failed to provide properly signed, undated, and completed authorization.</p>

25.	Molinaro, Ronald	1:19-cv-00710	Golomb & Honik, P.C.	<p>I.C Failed to provide complete end use date for Valsartan 320mg.</p> <p>I.C.2 Failed to attach complete records demonstrating product use (records redacted).</p> <p>VI.A.1-2 Failed to provide properly signed, undated, and completed authorization.</p>
26.	Moss, James	1:19-cv-14056	Hollis Law Firm, P.A.	<p>I.C.7 Information provided does not match SFC. Ranbaxy not named as manufacturers in SFC.</p> <p>III.G Failed to respond.</p> <p>V.G.3 Failed to provide outcome of hypertension treatment.</p> <p>XI.A.1, 6 Failed to provide properly signed, undated, and completed authorization.</p>
27.	Neal, Talsie	1:19-cv-16071	Golomb & Honik, P.C.	<p>III.B.5 Failure to provide information about custody of prescription bottle.</p> <p>III.C Failure to provide complete address and contact information for all listed pharmacies; failure to provide approximate dates for filled prescriptions for all pharmacies listed.</p> <p>VI.A.1-2 Failure to provide completed authorizations in the form approved by the Court.</p> <p>VII Failure to provide signed declaration relating to First Amended Economic Loss Plaintiff Fact Sheet.</p>



28.	Pate, Eugene	1:20-cv-01248	Watts Guerra	<p>III.G.a Failed to list medical expenses.</p> <p>V.G.4 Failed to provide complete information.</p> <p>- Medication used to treat diabetes and outcome - please clarify and explain the term “ongoing.”</p> <p>- Medication used to treat hypertension in 2013 and the outcome - please clarify and explain the term “ongoing.”</p> <p>- Medication used to treat hypertension in 2014 and the outcome - please clarify and explain the term “ongoing.”</p>
29.	Piccolo, Salvatore	1:20-cv-01624	Cellino and Barnes	<p>I.C Information provided does not match SFC. Please clarify the discrepancy.</p> <p>Pharmacy named in Short Form Complaint different from pharmacy named in PFS.</p> <p>V.G.4 Failed to provide complete information.</p> <p>Failed to list specific treatment for hypertension and outcome.</p> <p>XI.A.1, XI.A.6 Failed to provide completed and undated authorization.</p>
30.	Rich, Earline	1:19-cv-20643	Watts Guerra, LLP	<p>I.E.4 Failed to state whether Plaintiff was appointed Representative of the Estate, the Court and Case number.</p> <p>V.D1.b Failed to provide the date that decedent’s tobacco use started.</p> <p>V.D1.d.i-iii Failed to state the amount of tobacco decedent used, on average, per day, and for how many years.</p> <p>V.G.3 Failed to provide the onset dates for decedent’s Hypertension, Nausea, Vomiting and Diabetes.</p>

				<p>V.G.3 Failed to state the specific medication decedent received for Hypertension, Nausea, Vomiting and Diabetes.</p> <p>XI.A.1, 6 Failed to provide properly signed, undated, and completed authorization.</p>
31.	Richissin, Fred	1:19-cv-20407	Gainsburgh Benjamin	<p>I.C.7-8 Information inconsistent with Short Form Complaint.</p> <p>I.D Failure to respond and to attach pharmacy and medical records showing injury.</p> <p>III.D Failure to respond.</p> <p>III.G.a Failure to provide list of medical expenses.</p> <p>V.G.4 Failure to provide treatment received and outcome.</p> <p>XI.A.1, 6 Failure to provide proper authorization.</p> <p>XI.B.17, 18, 21-23 Failure to respond.</p> <p>XI.B.9, 11, 12, 16 Failure to provide requested records.</p> <p>XII Failure to provide signed and dated declaration.</p>
32.	Robinson, Clarence	1:20-cv-01057	Levin Papantonio	<p>III.G.1-3 Failure to provide expense information.</p> <p>V.G Failure to provide outcome of treatment for hypertension.</p> <p>XI.A.1, 6 Failure to provide completed authorizations in the form approved by the Court.</p>

33.	Strozewski, Terence	1:20-cv-01423	Cellino and Barnes	<p>I. D Incomplete date of diagnosis.</p> <p>XI. A. 1 Failure to attach completed Health Care Authorization.</p> <p>XI. A. 4 Failure to attach Workers' Compensation Authorization.</p> <p>XI. A. 5 Failure to attach completed Release of Disability Records Authorization.</p> <p>XI. A. 6 Failure to attach completed Insurance Records Authorization.</p>
34.	Williams, Thomas	1:19-cv-06849	Levin Papantonio	<p>I.C.8 Information is inconsistent with Short Form Complaint.</p> <p>III.G.a-c Failure to provide a list of medical expenses, provider, and date.</p> <p>XI.A.7.1-7 Failure to attach completed Health Care Authorization; Tax Return Forms Authorizations; Employment Authorizations; Workers' Compensation Authorization; Disability Records Authorization; Insurance Records Authorization; and Mental Health Authorization.</p>
35.	Young, Lester	1:20-cv-01507	Cellino and Barnes	<p>III. D. 1. Failure to respond. No symptom provided for prostate cancer.</p> <p>V. G Failure to provide name of medication and outcome.</p> <p>XI. A. 1, 6 Failure to attach completed Authorization.</p> <p>XI. B. 23 Failure to attach bankruptcy documents.</p>
36.	Zehr, Sarah	1:19-cv-12935	Levin Papantonio	<p>I.C. Failure to specify start and end dates for use of Valsartan distributed by Camber.</p> <p>IV.A.1-2 Failure to provide completed authorizations in the form approved by the Court.</p>

**TABLE C:**  
**PLAINTIFFS WHO HAVE AMENDED/SUPPLEMENTED**  
**PLAINTIFF'S FACT SHEETS**  
**WITH WHOM DISPUTES REMAIN (SECOND LISTING)**

	Plaintiff	Civil Action No.	Law Firm	Remaining Core Deficiencies
1.	Alrashid, Nazih	1:19-cv-12549	Levin Papantonio	<p>I.D Date of liver cancer diagnosis inaccurate – patient died 6/8/2017.</p> <p>Inconsistent with Short Form Complaint: Plaintiff does not list Lung cancer in Short Form Complaint.</p> <p>Failure to attach documents showing liver cancer.</p> <p>III.G Failure to list medical expenses.</p> <p>XI.A.1, 6 Failed to provide properly signed, undated, and completed authorization.</p>
2.	Axinn, David	1:19-cv-16205	Levin Papantonio	<p>III.G Failed to respond. Medical Expenses.</p> <p>V.G.3 Failed to respond. Date for the onset of decedent's hypertension and diabetes.</p> <p>XI.A.1 Failed to provide properly signed, undated, and completed authorization.</p>
3.	Brackman, Karen	1:19-cv-12085	Levin Papantonio	<p>XI.A.7.1-7 Failure to attach completed Health Care Authorization; Tax Return Forms Authorizations; Employment Authorizations; Workers' Compensation Authorization; Disability Records Authorization; Insurance Records Authorization; and Mental Health Authorization.</p>
4.	Brown, Janice	1:19-cv-17394	Levin Papantonio	<p>I.C.8 Information is inconsistent with Short Form Complaint.</p> <p>III.G.a Failure to provide medical billing records.</p>

				<p>V.G.4 Failure to specify medication used to treat hypertension and outcome.</p> <p>XI.A.106 Failure to provide completed authorizations.</p>
5.	Butcher, Steven	1:19-cv-14888	Golden Law Office	<p>II.D.2 Plaintiff uses unknown abbreviation “NCS” to refer to previous employer.</p> <p>III.E.2 Failure to provide name of diagnosing healthcare providers or treating healthcare providers; failure to provide address(es) of healthcare providers; failure to provide conditions treated; failure to provide dates of treatment; failure to provide medications prescribed.</p> <p>III.F.3 Failure to provide gross annual income for 2019.</p> <p>IV.D.1-3 Improper reliance on collateral source rule.</p> <p>V.F.49 Failure to specific whether Plaintiff has had ulcerative colitis.</p> <p>V.G.2 Failure to provide name, address, and other required information about providers.</p> <p>V.G.3 Failure to provide dates of onset for any conditions listed.</p> <p>V.G.4 Failure to provide treatment or outcome for “kidney problems”</p> <p>XI.A.1, 2, 3, 6 Failure to provide completed authorizations.</p> <p>XII Failure to provide signed and dated declaration.</p>
6.	Caudill, Cheryl	1:19-cv-14900	Golden Law Office	<p>I.C.9 Information provided does not match SFC. Plaintiff names multiple repackagers in her SFC, but names no repackagers in her PFS. Please clarify or explain.</p>

				<p>I.C.13 Failed to provide complete information. Provide the address of Anne Gillis.</p> <p>II.A.1 Failed to respond. Improper reliance on collateral source rule.</p> <p>II.D.4.c Failed to respond. Provide dates of exposure for red and/or processed meats.</p> <p>III.C.1 Failed to provide complete information.</p> <p>III.C.2 Failed to provide complete information in entire section.</p> <p>III.E.2.a, b. Failed to respond. If Plaintiff claims a medically diagnosed condition, provide the name of the diagnosing and treating healthcare provider and all other treating healthcare providers.</p> <p>IV.D.1-3 Failed to respond. Improper reliance on collateral source rule.</p> <p>XI.A.1 Plaintiff provides a single, generalized authorization and not one specific to “each health care provider, specialist,” etc. Plaintiff’s authorization is dated, but the instructions ask for an undated form.</p> <p>XI.A.6 Failed to provide properly signed and/or completed authorization. Improper reliance on collateral source rule.</p> <p>XI.A.7 Failed to provide properly signed and/or completed authorization. Plaintiff’s form does not contain any provider information. Plaintiff’s authorization is dated, but the instructions ask for an undated form.</p>
7.	Farmer, Douglas	1:19-cv-18582	Moore Law Group PLLC	I.C. Information provided does not match SFC. Please clarify the discrepancy.

				<p>Hetero named as API manufacturer in SFC but not in PFS.</p> <p>Camber named as labeler/distributor in SFC but not in PFS.</p> <p>I.C.11 Failed to provide complete end date for Valsartan use in 2015 and 2017.</p> <p>III.G Failed to respond to questions in this section III.G</p>
8.	Gremillion, Elizabeth	1:19-cv-06826	The Law Offices of Kenneth W. DeJean	<p>I.C Failure to provide complete end date for Valsartan use in 2018.</p> <p>V.G.4 Failed to provide complete information.</p> <p>Specify outcomes for hypertension treatment.</p> <p>VIII.A.5 Failed to respond.</p> <p>Provide date of diagnosis.</p>
9.	Harper, April	1:19-cv-01618	Levin Papantonio	<p>III.F.4.A Failure to provide complete information. Income to date does not compute with the amount of time Plaintiff claims disability related to this case.</p> <p>XI.A.7.1-7 Failure to attach completed Health Care Authorization; Tax Return Forms Authorizations; Employment Authorizations; Workers' Compensation Authorization; Disability Records Authorization; Insurance Records Authorization; and Mental Health Authorization.</p>
10.	Jackson, Rogers	1:19-cv-16207	Levin Papantonio Thomas Mitchell Rafferty & Proctor, P.A.	III.G.a - Failed to provide complete information.
11.	Lamhut, Jerold	1:19-cv-13772	Bernstein Liebhard LLP	<p>III.G.a Failure to respond.</p> <p>V.D Failed to provide dates when tobacco use started.</p>

12.	Pollock, Karen	1:19-cv-06833	Levin Papantonio Thomas Mitchell Rafferty & Proctor, P.A.	<p>III.G.a - Failed to provide complete information. - Failed to specify the total amount of medical expenses or the individual amounts. Please clarify.</p> <p>III.G.b - Failed to respond.</p> <p>III.G.c - Failed to respond.</p>
13.	Sen, Ranjit	1:19-cv-07143	Levin Papantonio	<p>III.F.3 Failure to provide 2019 annual gross income.</p> <p>III.F.4.a Failure to provide amount of lost income claimed as a result of a condition caused by a valsartan product.</p> <p>III.G. Failure to provide amount of medical expenses.</p> <p>XI.A.2, 6, and 7 Failure to provide completed authorizations in form approved by the Court.</p> <p>XI.B.17 Failure to provide federal tax returns for each of the five (5) years preceding the injury you allege to be caused by valsartan products.</p>
14.	Watts, Peggy	1:19-cv-08718	Levin Papantonio	<p>III.G.a-c Failure to provide a list of medical expenses, provider, and date.</p> <p>XI.A.1, 2, and 6 Failure to attach completed authorizations.</p>
15.	Winiecki, Daniel	1:19-cv-07153	Levin Papantonio	<p>I.C.8 Information is inconsistent with Short Form Complaint.</p> <p>III.G.a-c Failure to provide provider information, dates, and expenses.</p> <p>XI.A.1 Failure to attach properly completed authorization.</p>